VN:KMA; 2019V02252

April 22, 2022

<u>By ECF</u>

Honorable Brian M. Cogan
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

      Re: *Stahl v. Federal Bureau of Prisons and U.S. Department of Justice,*
           <u>Civil Action No. 19-CV-04142 (BMC)</u>

Dear Judge Cogan:

In accordance with Your Honor's Order dated April 12, 2022, the Federal Bureau of Prisons ("BOP") is proposing October 31, 2022 as the date by which it will produce the thirteen redacted videos to Plaintiff.[1]

As explained in the Declaration of Kara Christenson (Dkt. #37-1), the BOP recently obtained access to and has been evaluating the efficacy of additional video editing software through Veritone as part of a pilot project. The BOP's proposed date takes into account the time needed to enter into a purchase contract with Veritone for use of the video editing software once funds are allocated, approximately 80 hours for editing of the videos, and the time that will be required for review and additional modifications needed to produce a final product.

---

[1] At issue in this action brought pursuant to the Freedom of Information Act, 5 U.S.C. § 552 ("FOIA"), are thirteen videos taken with two cameras at different angles of two involuntary medical treatments administered to inmate Mohammad Salameh during his hunger strike at the Administrative Maximum (ADMAX) United States Penitentiary in Florence, Colorado. Six videos are of the administration of intravenous hydration on November 4, 2015, and the other seven are of the administration of liquid nutrition through a nasogastric tube on November 11, 2015.

Thank you for Your Honor's consideration of this submission.

Respectfully submitted,

BREON PEACE
UNITED STATES ATTORNEY
Attorney for Defendants

By: s/*Kathleen A. Mahoney*
KATHLEEN A. MAHONEY
Assistant U.S. Attorney
(718) 254-6026
kathleen.mahoney@usdoj.gov

cc: (By ECF)

Counsel for Plaintiff